

January 23, 2009

Carole Davis  
Co-Executive Secretary of the Dietary Guidelines Advisory Committee  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

RE: Dietary Guidelines for Americans Advisory Committee; Invitation for Oral Testimony and Solicitation of Written Comments

Dear Ms. Davis:

I am writing on behalf of the Canned Food Alliance (CFA) regarding USDA's invitation for oral testimony and call for comments for the second meeting of the Dietary Guidelines Advisory Committee (DGAC). CFA appreciates the opportunity to provide the DGAC with information about the importance of including canned fruits, vegetables, beans, lean meats, seafood, poultry and other nutritious canned foods as part of the 2010 Dietary Guidelines for Americans.

The CFA is dedicated to promoting the nutrition, convenience, contemporary appeal and versatility of canned foods and applauds the DGAC, USDA and the Department of Health and Human Services staff for their work on the development of the 2010 Dietary Guidelines for Americans.

The 2005 Dietary Guidelines for Americans and MyPyramid Food Guidance System promote all forms of fruits and vegetables – including canned, and additional nutritious canned foods. CFA strongly urges that the 2010 Dietary Guidelines for Americans continue to include and promote canned products that are consistent with the overall dietary recommendations included in the guidelines. Since the 2005 Dietary Guidelines for Americans were issued, there have been a number of studies confirming the benefits of canned foods. These studies and additional information about canned food are summarized below.

**Consumers want more choices to help them meet their goals.** In research commissioned by the Produce for Better Health Foundation, consumers were relieved to know that canned and frozen fruits and vegetables counted towards helping them meet their dietary goals.<sup>1</sup> In addition, the National Fruit & Vegetable Program's Fruits & Veggies – More Matters campaign is the largest public-private education initiative and recommends all forms of fruits and vegetables to help Americans meet recommended levels.<sup>2</sup>

**Fresh does not always mean more nutritious.** A University of California (Davis) study published in the Journal of the Science of Food and Agriculture concluded that exclusively recommending one form of fruit or vegetable over another ignores the benefits that each form provides and limits consumer choice. All forms – canned, fresh and frozen – of the fruits and vegetables reviewed provide needed nutrients to the diet. The canning process locks in nutrients at their peak of freshness and due to the lack of oxygen during the storage period, canned fruits and vegetables remain relatively stable up until the time they are consumed and have a longer shelf-life.<sup>3</sup>

**The ingredients you choose, not the form of the ingredients, are what really determine a recipe's nutrient content.** A three-part study conducted by the University of Massachusetts found that, from a nutrition and sensory standpoint, recipes prepared with canned ingredients and those prepared using

cooked fresh and/or frozen ingredients were rated comparably. This research also showed similar nutrient profiles of dishes made from canned, cooked fresh and/or frozen ingredients.<sup>4</sup> Canned beans, fruits and vegetables provide a number of key nutrients including potassium, magnesium, folic acid and iron. Canned seafood provides an excellent source of protein, B-vitamins and Omega-3 fatty acids.

**All forms of fruits and vegetables make a positive contribution to the diet.** Studies conducted by the University of Illinois Department of Food Science and Human Nutrition also confirmed that canned foods are comparable to cooked fresh and frozen varieties in their nutrient contribution to the American diet.<sup>5</sup>

**Some canned products actually contribute more health promoting antioxidants than their fresh counterparts.** An Oregon Health Sciences University study demonstrated increased amounts of some key anthocyanins, a powerful antioxidant, in canned blueberries, compared to the amounts in fresh and frozen blueberries.<sup>6</sup> Canned tomatoes, carrots, spinach, corn and pumpkin are rich in antioxidants. According to the USDA, one-half cup of canned tomatoes provides 11.8 milligrams of lycopene compared to just 3.7 milligrams found in one medium fresh, uncooked tomato. Mild heat treatment of carrots and spinach, as used in commercial canning, enhances the bioavailability of carotene, which is converted to vitamin A in the body. The absorption of lutein in corn, an antioxidant that may reduce the risks of cataracts and macular degeneration, also is enhanced by heat from the canning process, according to research from Cornell University. Canned pumpkin is loaded with beta carotene, a substance from plants that converts to vitamin A and is said to protect against certain types of cancer and heart disease. Canned pumpkin contains a higher concentration of beta carotene than fresh pumpkin because of the canning process.<sup>7</sup>

**Canned fruits and vegetables are affordable.** The USDA Economic Research Service July 2004 report (How Much Do Americans Pay for Fruits and Vegetables? Agriculture Information Bulletin Number 790) concluded that: "...whether fresh, frozen, or canned, all 85 of the vegetables we priced were less than a dollar per serving, only three cost more than 75 cents a serving, and more than half were less than a quarter."<sup>8</sup>

**Canned fruits and vegetables do not contribute significantly to American's sugar and sodium intake.** In fact, all canned fruits and fruit juices contribute less than two percent of added sugars in most American's diets and vegetables contribute less than one percent of sodium.<sup>9</sup>

**Canned fruits and vegetables are safe.**

- In a review of over 5,300 foodborne-related outbreaks and over 157,800 cases of illness, commercially produced canned fruits and vegetables did not directly account for a *single* food borne outbreak. (The produce category was linked to the largest number of food borne illnesses associated with outbreaks – over 700 food borne outbreaks and 34,000 illnesses.)<sup>10</sup>
- The metal food can is one of the safest types of food packaging – it is tamper resistant, provides an airtight seal, is thermally sterilized and shelf stable.<sup>11</sup>

**Canned food is packed in the most recycled food container.** The majority of canned food is packed in recyclable steel cans; steel cans are the most recycled food and beverage containers and contain a minimum of 28% recycled content.<sup>12</sup>

At a time when American's fruit and vegetable consumption is low – the average American gets a total of just 3 servings of fruits and vegetables a day-- efforts to encourage Americans to consume more fruit and vegetables such as Fruits & Veggies – More Matters, the Dietary Guidelines for Americans, MyPyramid Food Guidance System, and other public and private initiatives must continue to promote canned fruits and vegetables as a convenient and nutritious way for Americans to meet daily recommendations.

CFA looks forward to the deliberations of the DGAC and stands ready to answer any questions regarding the importance of canned food in helping Americans meet recommendations set forth in the Dietary Guidelines for Americans.

Sincerely,



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Canned Food Alliance  
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### ***About the Canned Food Alliance***

*The Canned Food Alliance (CFA) is a partnership of the American Iron and Steel Institute's Steel Packaging Council, the Can Manufacturers Institute, select food processors and affiliate members. The primary mission of the CFA is to serve as a resource for information on the nutrition, convenience, contemporary appeal and versatility of canned food. For hundreds of mealtime solutions, visit [www.mealtime.org](http://www.mealtime.org).*

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<sup>1</sup> Sterling Brands presentation on PBH Fruits and Veggies More Matters© brand development, Summer 2006

<sup>2</sup> [pbhfoundation.org](http://pbhfoundation.org)

<sup>3</sup> Rickman, J., Barrett, D. and Bruhn, C. 2007. Nutritional comparison of fresh, frozen and canned fruits and vegetables. *Journal of the Science of Food and Agriculture*

<sup>4</sup> Samonds, K. 2000. Nutrition Study Phase I, Phase II and Phase III. University of Massachusetts

<sup>5</sup> Klein, B. and Kaletz, R. 1997. Nutrient conservation in canned, frozen, and fresh foods. University of Illinois

<sup>6</sup> Hatton, D. 2004. The Effect of Commercial Canning on the Flavonoid Content of Blueberries. Oregon Health Sciences University

<sup>7</sup> U.S. Department of Agriculture, Agricultural Research Service. 2005. USDA National Nutrient Database for Standard Reference, Release 18. Nutrient Data Laboratory Home Page, <http://www.ars.usda.gov/ba/bhnrc/ndl>; Dewanto, V., X. Wu, and R.H. Liu. 2002. Processed sweet corn has higher antioxidant activity. Cornell University

<sup>8</sup> U.S. Department of Agriculture, Economic Research Service report: How Much Do Americans Pay for Fruits and Vegetables? Agriculture Information Bulletin Number 790, <http://www.ers.usda.gov/publications/aib790/aib790.pdf>

<sup>9</sup> JADA: Guthrie, J. and Morton, J: Food sources of added sweeteners in the diets of Americans, vol. 100, no. 1, 2000; JADA, Cotton, P. et al: Dietary sources of nutrients among US adults, 1994 to 1996, vol. 104, no. 6, 2004

<sup>10</sup> Center for Science in the Public Interest *Outbreak Alert: Closing the Gaps in Our Federal Food-Safety Net*, Dec. 2007.

<sup>11</sup> FDA's Center for Food Safety and Applied Nutrition, Centers for Disease Control and Prevention, Moffett Center – National Center for Food and Safety Technology, FDA, *Journal of Food Protection*, *International Journal of Food Microbiology*, *International Journal of Food Science and Technology*, U.S. Department of Health and Human Services, United States Department of Agriculture (US DHHS/USDA), Iowa State University Extension, *USA Today*, *Food Chemical News*, *Chicago Daily Herald*, Canadian Food Inspection Agency, Packaging Glossary, Food Product Design, National Institute for Health and USDA Food Safety and Inspection Service.

<sup>12</sup> Steel Recycling Institute, [www.recycle-steel.org](http://www.recycle-steel.org)